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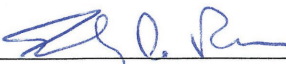
**ALSO ADMITTED IN CONNECTICUT

July 5, 2022

BY ECF

Honorable Edgardo Ramos
Courtroom 619
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

The request is granted. The documents may remain under seal. SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: July 5, 2022
New York, New York

Re: Remcoda, LLC v. Ridge Hill Trading (PTY) LTD, et al., 21 Civ. 979 (ER)

Dear Judge Ramos:

I represent defendant Russell Gross and, on June 30, 2022, filed on his behalf a Motion to Dismiss plaintiff's Second Amended Complaint together with supporting materials (the "MTD Filings"). Dkts. 155, 156, 157. At our request, the Clerk of the Court has placed the MTD Filings under seal, and I write respectfully pursuant to the Court's Individual Rules to request that the Court approve the MTD Filings remaining under seal for a limited time with access restricted to attorneys of record.¹

Because the MTD Filings reference and include documents produced in discovery that were designated by one or more parties as confidential, consistent with the so-ordered Protective Order in this case, they were placed under seal by the Clerk of the Court. See Dkt. 103. Counsel for all parties have discussed a procedure for addressing the continued sealing of the MTD Filings, and have agreed to a proposed approach whereby between now and July 15, 2022, the parties will confer as to what documents, if any, in the MTD Filings should remain under seal, and by July 15, 2022, the parties will inform the Court by letter of their respective positions. In the interim period, we request that the Court approve the continued sealing of the MTD Filings, with viewing

¹ The documents for which Mr. Gross requests the above-referenced viewing restriction appear at: Dkts. 156, 156-6, 156-7, 156-8, 156-11, 156-12, 156-13, 156-14, 156-15, 156-16, 156-17, 156-18, 156-19, 156-20, 156-21, 156-22, 156-23, 156-24, 156-25, 156-26, 156-27, 156-28, 156-29, 156-30, and 157.

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restricted to court personnel and attorneys of record in this action. *See* Elec. Case Filing & Instructions § 6.9.

We have conferred with counsel for the other parties (Remcoda, LLC; Ridge Hill Trading (PTY) LTD; and Ataraxia Capital Partners PTY LTD), and they consent to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Robert J. Anello
Robert J. Anello

cc: All counsel (by ECF)